



# United States Department of the Interior

## BUREAU OF LAND MANAGEMENT

### California Coastal National Monument

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March 17, 2008

Blue Ribbon Task Force  
Marine Life Protection Act Initiative  
c/o 1416 Ninth Street  
Sacramento, CA 95814

### **RE: Marine Protected Areas for California's North-Central Coast**

Dear Chair Golding and Members of the Blue Ribbon Task Force:

I am writing in support of the concept of Special Closures associated with the Marine Life Protection Act (MLPA) initiative to establish marine protected areas along California's North-Central Coast region. As the manager of the California Coastal National Monument, I have a strong interest in the protection of unique California coastal resources.

The California Coastal National Monument (CCNM) is one of the Nation's most unique national monuments. It consists of more than 20,000 rocks, small islands located off the 1,100 miles of the California coastline. Under the responsibility of the United States Department of the Interior's Bureau of Land Management (commonly referred to as the "BLM"), the CCNM is part of the National Landscape Conservation System. Established on January 11, 2000, by Presidential Proclamation under the authority of section 2 of the Antiquities Act of 1906, the CCNM is among the most viewed but the least recognized of any of the Nation's national monuments. As stated in the Presidential Proclamation, the CCNM was established to elevate the protection of "all unappropriated or unreserved lands and interest in lands owned or controlled by the United States in the form of islands, rocks, exposed reefs, and pinnacles above mean high tide within 12 nautical miles of the shoreline of the State of California." The Presidential Proclamation recognizes the need to protect the CCNM's overwhelming scenic quality and natural beauty, and it specifically directs the protection of the geologic formations and the habitat that these rocks and small islands (i.e., the portion above mean high tide) provide for seabirds, sea mammals, and other plant and animal life (both terrestrial and marine) on the CCNM. In addition, the Presidential Proclamation recognizes the CCNM as containing "irreplaceable scientific values vital to protecting the fragile ecosystems of the California coastline."

The CCNM Resource Management Plan (RMP), which provides the "blueprint" for the management of the CCNM and was completed in September 2005, identified "seabird conservation" as one of the six CCNM major implementation priorities. We are, therefore, very interested in and supportive of the concept of Special Closures associated with MLPA marine protected areas along California's North-Central Coast region. This concept is very consistent with the objectives of our seabird conservation initiative. As you are aware, the California Central Coast is a critical area for breeding seabirds, supporting the largest concentrations of breeding seabirds in the contiguous United States.

The rocks and small islands of the CCONM provide breeding habitat for a fair portion of this critical seabird breeding area.

The MLPA North-Central Coast Special Closures working group and other stakeholders have identified 10 specific locations that they have determined warrant “special closure” status. We strongly support all 10 of these special closures as a needed effort to help protect the dwindling seabird habitat along the California coast. Four of the 10 areas encompass rocks and small islands that are part of the CCONM. These are Devil’s Slide Rock (north San Mateo County), Fish Rocks (south Mendocino County), Gualala Point Island (north Sonoma County), and the Russian River Area (off the north end of the Sonoma Coast State Beach in Sonoma County). These four CCONM areas are briefly discussed as follows:

**Devil’s Slide Rock** - With the increased development and people-pressure in the San Francisco Bay area, Devil’s Slide Rock has provided one of the few relatively undisturbed natural nesting sites for the Common Murre and Brandt’s Cormorant in the area. Its location along the roughed and relatively undeveloped portion of the San Mateo County coast between Pacifica and Moss Beach has provided an anomaly for this area, making Devil’s Slide Rock a very important seabird nesting site for this portion of the coast. The success of the U.S. Fish and Wildlife’s Common Murre Restoration Project in bring the Common Murre population back from zero in 1995 to 12% in 2006 of its historic population of 3,000 breeding birds is a good indication of the location’s potential. In comparison, on the larger San Pedro Rock to the north, that once had nesting Common Murres but now has none, attempts to restore nesting have not been successful. Among other possible factors, the significant increase in homes and other development in sight of the rock and increase boating and water activities around it appear to be a contributing factors to the failure to restore nesting.

**Fish Rocks** - Fish Rocks is make up one of the largest islands of the CCONM. It also contains the largest and most diverse seabird colony in the northern sub-region of the North-Central Coast study region. Fish Rocks include a west rock and an east rock that is connected at mean high tide by a small sandy beach. The west rock contains much of the nesting seabird activity. The U.S. Fish and Wildlife Service report that there are nine species and over 900 breeding birds currently using the small islands. The seabird species include both Pelagic and Brandt’s Cormorants, Pigeon Guillemots, Leach’s Storm Petrels, and a small number of Rhinoceros and Cassin’s Auklets, and few Tufted Puffins. In addition, Fish Rocks provides a regular haul out area for Harbor Seals and California Sea Lions. California Sea Lions regularly use both the east and the west rocks, while Harbor Seals are regularly seen on the small connecting beach between the east and west rocks. Northern Elephant Seals have also been observed hauled out on the small connecting beach. This is an area where it is not common to see elephant seals on the beaches.

**Gualala Point Island** – Providing habitat for one of the few cormorant colonies along the northern Sonoma County coast, Gualala Point Islands has been a key seabird nesting site for years. Like the rest of the California coast, however, seabird populations on the island have been dramatically dropping over the past 20 years. Doing whatever can be done to help reduce disturbance by human activities to nesting seabird colonies on locations such as Gualala Point Island is essential to the future survival of a wide variety of seabirds. Nesting seabirds on the island include Brandt’s and Pelagic Cormorants, Pigeon Guillemots, and Western Gulls. Black Oystercatchers also nest on the island and the island provides a key roosting location for the Brown Pelican.

**Russian River Area** – Arched Rock and Gull Rock contain two of the three major seabird colonies in this area. This includes Brandt's and Pelagic Cormorants, Pigeon Guillemots, and Western Gulls. Black Oystercatchers also nest on the on these rocks. In addition, a large Harbor Seal rookery of about 450 seals is within this area. Including Half Mile Rock and Mile Rock, as well as the colony referred to as the Russian River Rocks just north of the mouth of the Russian River, would add protection to the area's Double-Crested Cormorant colony. Protection efforts are needed to help deal with the declining population numbers.

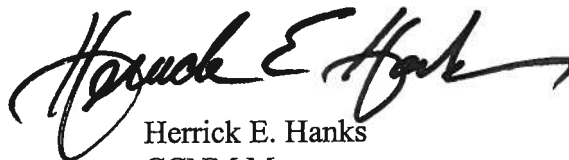
In order to protect all four of these critical seabird nesting locations, 300-foot closures around these rocks would be the absolute minimum. Anything less would not be effective. The U.S. Fish and Wildlife Service's study at Three Arch Rocks National Wildlife Refuge in Oregon determined that most human disturbance (e.g., boat encroachment) occurred within 500 feet. Other U.S. Fish and Wildlife Service monitoring data of nearshore central California seabird colonies suggests that disturbance is nearly eliminated at distances of 1,000 feet or greater.

The use of Special Closures for four locations associated with the CCNM, as well as the other six locations within California's north-central coast region, as a means of applying a more holistic approach to the MLPA's marine protected areas, provides an important tool for helping protect critical seabird and pinniped habitats. The use of this tool will demonstrate that the MLPA initiative is truly an ecosystem approach.

In addition, the use of Special Closures around rocks that are part of the CCNM is very consistent with the protection purpose for establishing the CCNM. The BLM has the authority to establish closures, including temporary, seasonal, or permanent, on the CCNM, but not the authority to establish closures around the CCNM. That is one of the major reasons that the BLM has partnered with other governmental agencies and entities that do have jurisdiction adjacent to the CCNM. In order to collaborate on the long-term administration and oversight of the CCNM, BLM has developed a "core-managing" partnership with the California Department of Fish and Game and California State Parks. The BLM has also developed numerous "collaborative" partners (including U.S. Fish and Wildlife Service) and a few select "Stewards". With these partners, we will be relying on them to assist us in providing appropriate protective actions that will enhance the protection needs for specific locations associated with the CCNM. Using the Special Closure concept would be an appropriate protective action.

If you have any questions or need clarification or further explanation, please do not hesitate to contact me at (831) 372-6105 or via e-mail at [hhanks@ca.blm.gov](mailto:hhanks@ca.blm.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Herrick E. Hanks", with a stylized flourish at the end.

Herrick E. Hanks  
CCNM Manager